In the Matter of Children's Television Programming Rules, Modernization of Media Regulation Initiative, MB Docket No. 18-202



Institute for the Study of Knowledge Management in Education ("ISKME")

Introduction

• The Institute for the Study of Knowledge Management in Education ("ISKME") is an independent, education nonprofit whose mission is to improve the practice of continuous learning, collaboration, and change in the education sector. Established in 2002 and based in Silicon Valley, ISKME supports innovative teaching and learning practices throughout the globe and is well-known for its pioneering open education initiatives.

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Introduction

• Broadcast television plays a unique and vital role in improving the educational outcomes of children. The Commission must ensure that its efforts to "modify outdated requirements and to give broadcaster greater flexibility" in complying with the Children's Television Act of 1990 ("CTA") serve to enhance, rather than undermine, the learning opportunities made available to America's children.



BROADCAST TELEVISION REMAINS A CRITICAL TOOL FOR EFFECTIVELY DELIVERING EDUCATIONAL CONTENT TO AMERICA'S CHILDREN



Broadcast Television Remains a Critical Tool

- In enacting the CTA, Congress recognized that television can benefit society by helping to educate and inform our children. Congress concluded that children watch educational programming without being forced to do so and that educational programming effectively reached low-income communities.
- The Commission also expressly found that the clear objective of the CTA is to "increase the amount of educational and information broadcast television available to children" by "placing on each and every licensee an obligation to provide educational and information programming, and requiring the FCC to enforce that obligation."



Educational Television Positively Impacts Learning

Recent research continues to validate this conclusion:



16 and Pregnant had "a sizeable impact on the rate at which teens give birth in the U.S., generating a 4.3% reduction in teen births that would have been conceived between June 2009, when the show began, and the end of 2010."

- Melissa Kearney and Phillip Levine



Sesame Street represents "perhaps the biggest, yet least costly, early child intervention" that "costs pennies on the dollar relative to other early childhood interventions"

- Melissa Kearney and Phillip Levine



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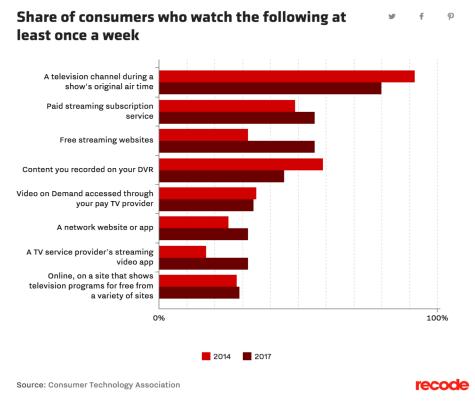
Broadcast Television Remains a Great Equalizer

 In 2014, 300 million Americans age 2 and older live in households with a television, meaning it continues to be one of the most ubiquitous media platforms in America.

QI 2018 WEEKLY REACH % OF USERS 18+ AMONG U.S. POPULATION

Radio measurement includes Asian Americans but cannot be separated from the total audience at this time

 While the "major shift in the way in which viewers, including children, consume video programming" is true, Live TV continues to be the platform most commonly used:

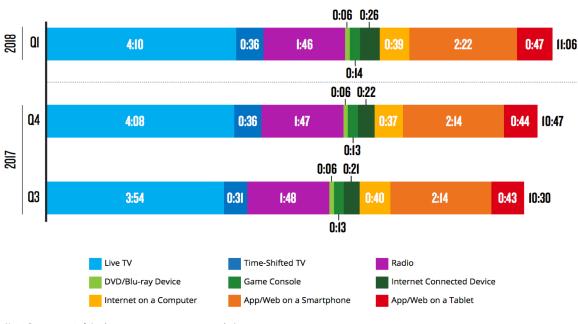




A recent Nielsen report confirms that during the 1Q of 2018,
 U.S. adults spent more time watching Live TV than any other platform:

AVERAGE TIME SPENT PER ADULT 18+ PER DAY

BASED ON TOTAL U.S. POPULATION

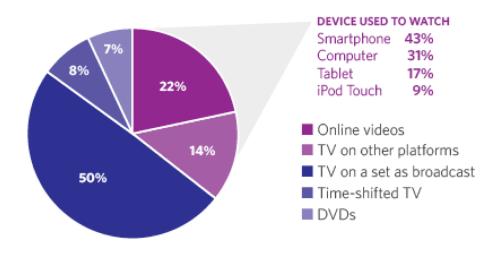




Note: Some amount of simultaneous usage may occur across devices.

 Regarding children, a report by the nonprofit media advocacy group Common Sense establishes that among teens "half (50%) of all TV- and video-viewing time consists of watching TV programming on a TV set at the time it is broadcast."

Figure 6. TV and video viewing among teens, by platform



Note: Percentages may not add to 100% due to rounding.



And that "of all teen viewing on a TV set, 13% is time-shifted and 87% is not. Therefore, among teens, total TV viewing (online and on a TV set) is now divided such that 70% is watching TV as it is broadcast on a TV set, 11% is watching time-shifted TV on a TV set, and 19% watching on other devices."

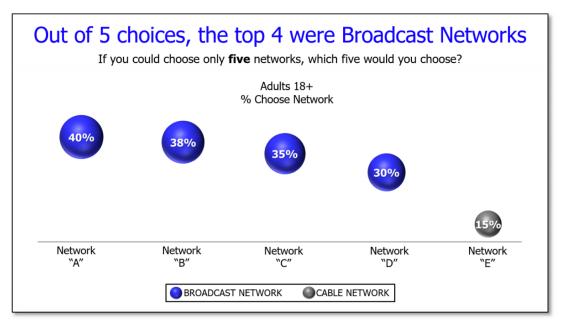
TABLE 19. TOTAL TV VIEWING: DEVICES AND TIME-SHIFTING

	Among Tweens		Among Teens		
Device	Average time spent watching	Proportion of all TV time	Average time spent watching	Proportion of all TV time	Proportion of TV-set time
TV set	1:29	83%	1:31	81%	_
 Time-shifted* 	-	-	:12	11%	13%
• Live*	-	_	1:19	70%	87%
Computer, tablet, or smartphone	:18	17%	:22	19%	_
Total	1:47	100%	1:53	100%	100%

^{*} Question only asked of teens.



 A recent survey underscores just how critical the major broadcast networks are to the American people. When "respondents were asked to pick only five networks [they could watch], the top four were broadcast networks by a wide margin, with the fifth choice being a cable network:"





 Considering these high audience and penetration rates, broadcast television is a great equalizer for lower income households and children with limited access to other platforms and broadband Internet access:

There is a large "digital equality gap" in ownership of computers, tablets, and smartphones. Children in lower-income families are significantly less likely than their wealthier peers to live in homes with digital technologies. For example, 54% of lower-income teens (whose families make less than \$35,000 a year) have a laptop in the home, compared with 92% of higher-income teens (\$100,000 a year or more). One in 10 lower-income teens has only dial-up Internet at home, compared with none of the higher-income teens in our sample. And lower-income teens are much less likely to have their own smartphones as well (51%, compared with 78% of higher-income teens)."

- Common Sense Report



Digital Equality Gap:

Figure 8. Digital inequality: Ownership of devices, by family income

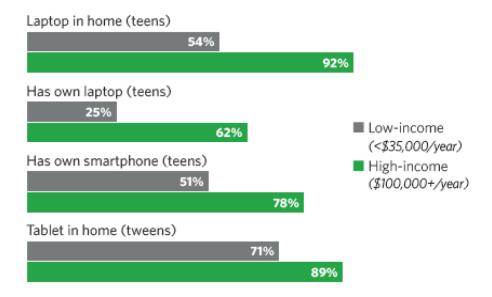


TABLE 14. MEDIA OWNERSHIP AMONG 8- TO 18-YEAR-OLDS, BY FAMILY INCOME

Media Type	Lower Income	Middle Income	Higher Income	%-point difference			
In the home:							
 Smartphone 	65%ª	85% ^b	93%°	-28			
 Tablet 	62%ª	77% ^b	87%°	-25			
• E-reader	13%ª	28% ^b	41%°	-28			
 Video game player 	71%ª	84% ^b	88%°	-17			
 TV set 	89%ª	96%⁵	98% ^b	-9			
Have their own:							
 Laptop (among teens) 	25%ª	44% ^b	62%°	-37			
 Smartphone (among teens) 	51%ª	69%⁵	78%°	-27			
 Tablet (among tweens) 	48%ª	53% ^{ab}	56%⁵	-8			
TV in bedroom (among all)	68%ª	52%⁵	39%°	+29			
 Video game player in bedroom (among all) 	37%ª	30%⁵	20% ^c	+17			

Note: "Lower income" is defined as <\$35,000; "middle" is \$35,000-99,999; and "higher" is \$100,000 or more. "%-point difference" indicates the degree to which the lower-income group differs from the higher-income group. Superscripts (a,b,c) are used to denote whether differences between groups are statistically significant (p<.05). Items with different superscripts differ significantly. Items that do not have a superscript, or that share a common superscript, do not differ significantly.



THE COMMISSION SHOULD CONSIDER LAUNCHING A PILOT PROGRAM TO GAIN GREATER INSIGHTS INTO THE VALUE OF CROSSPLATFORM LEARNING APPROACHES



- Research demonstrates that cross-platform approaches to education may be uniquely effective in improving learning outcomes, although the field continues to evolve.
- The Commission should implement a pilot program aimed at garnering deeper knowledge that can inform future decisionmaking for "cross-platform learning."
- "The 'newness' of the field means that effective models for cross-platform production, and effective approaches to instructional design for such media, are still being identified and developed" – Journal of Children and Media

Successful examples of cross-platform educational approach:



East Los High is the "first transmedia program purposefully designed as edutainment to tackle sexual and reproductive health issues."

- American Journal of Public Health



Between the Lions "television shows, Web sites, print materials, and classroom instruction were designed to complement one another," and, in fact, is "even more powerful than predicted."

- PBS



- PBS has developed a prototype "learning analytics platform" ("LAP") for "collecting, storing, and analyzing data created when children interact with a digital library of transmedia, with the purpose of powering applications that use the resulting information to support children's learning."
- The vision espoused by PBS is one in which education may start with a television show, but then continues onto other platforms. Equally important, PBS's vision is one that is research-driven and informed by data. As new devices and platforms gain greater adoption, PBS is clearly providing a path that the FCC could incentivize other broadcasters to follow in fulling the mandates of the CTA.



- The Commission's pilot program should acknowledge the economic incentives of broadcasters who develop high-quality cross-platform educational opportunities by granting credit towards their requirements to broadcast E/I content. The pilot program should consider the following:
 - 1. The cross-platform learning must address the same educational content as the television show;
 - 2. The cross-platform learning must use the same characters to further the learning begun on the television show;
 - 3. The television show must "nudge" viewers to the cross-platform learning opportunity at least once at the end of each episode;
 - 4. The applicant to participate in a pilot program must prepare, submit and implement a robust research plan that seeks to measure, *inter alia*, whether viewers who participate in the cross-learning platform have improved educational outcomes; and
 - 5. The applicant must make its full research results available to the Commission and researchers for analysis, subject to applicable privacy requirements.



FINAL THOUGHTS



Final Thoughts

- Children who watch the most broadcast television are the same children who have the least access to other platforms and devices.
- This fact underscores the importance of maintaining CTA regulations that ensure an adequate supply of high-quality educational and information programming.
- The Commission can and should consider initiating a pilot program that encourages broadcasters to invest in deepening the learning experience by extending beyond the screen.
- Such a program should ensure that the Commission and researchers can gain greater insights into the power of cross-platform learning that may inform future rulemakings

Thank You

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